

BEFORE THE  
POSTAL RATE COMMISSION  
WASHINGTON, D.C. 20268-0001

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Postal Rate and Fee Changes, 1997

Docket No. PRC-1  
POSTAL RATE COMMISSION  
OFFICE OF THE SECRETARY

**NEWSPAPER ASSOCIATION OF AMERICA  
INTERROGATORIES TO  
UNITED STATES POSTAL SERVICE WITNESS  
CARL G. DEGEN (NAA/USPS-T12-1-2)  
August 15, 1997**

The Newspaper Association of America hereby submits the attached interrogatories to United States Postal Service witness Carl G. Degen and respectfully requests a timely and full response under oath.

Respectfully submitted,

NEWSPAPER ASSOCIATION OF AMERICA

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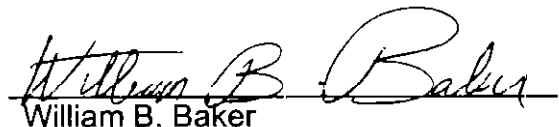


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**CERTIFICATE OF SERVICE**

I hereby certify that I have this date served the instant document on all participants of record in this proceeding in accordance with section 12 of the Rules of Practice.

August 15, 1997

  
William B. Baker

NEWSPAPER ASSOCIATION OF AMERICA  
INTERROGATORIES TO  
UNITED STATES POSTAL SERVICE WITNESS  
CARL G. DEGEN (NAA/USPS-T12-1-2)

NAA/USPS-T12-1. Please refer to the discussion at page 7, lines 17-18 and page 8, 1-6 of your direct testimony, regarding the assignment of the tallies at MODS offices to cost pools. Please provide the following data:

- a. The percentage of tallies that contain a valid MODS operation code;
- b. The percentage of tallies assigned to cost pools based on combinations of IOCS question 18 and 19 responses; and
- c. The percentage of tallies assigned to cost pools using the IOCS operation codes.

NAA/USPS-T12-2. Please refer to Table 5 of your written testimony. For each of the MODS codes listed in Table 5, please provide the following data:

- a. The number of direct tallies;
- b. The number of mixed mail tallies (broken down into "counted" mixed mail item, "uncounted" mixed mail item, "identified" mixed mail container and "not-identified" mixed mail container categories, if possible); and
- c. The number of not-handling-mail tallies.